

74321



SAEGERTOWN MANUFACTURING CORPORATION

August 31, 1988

United States Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

ATTN: Diane M. McCreary  
Region III NPL Docket Clerk

Dear Ms. McCreary:

This letter is a follow-up to the August 22, 1988 communication to you from our attorneys, Knox Graham McLaughlin Gornall and Sennett, Inc., regarding the listing of Saegertown Manufacturing Corporation (SMC) on the EPA National Priorities List. The National Priorities List, as published in the Federal Register on June 24, 1988, identified SMC as one of three potential sources of contamination of the Saegertown Borough water supply. SMC disagrees with this listing and herewith offers additional information regarding our non-participation in this environmental pollution incident.

As we previously informed you on November 25, 1980, SMC has not, nor have we ever, used TCE at this facility as our documents and research of past activities have identified. We have undertaken extensive efforts to review our chemical inventory files and evaluated all past activities and have not identified any TCE in use at any time. It is recognized that some trace amounts of TCE may be in two specific materials that have been and are currently used. These materials are 8-oz. dispenser containers, which are consumed during use. Therefore, it is unlikely that TCE contamination of borough water supplies emanated from this facility.

Analysis of septic tank sludge by the Pennsylvania Department of Environmental Resources indicated that "TCE Breakdown" products were found in trace amounts. It is because of this finding that EPA now believes that TCE was being utilized by SMC and disposed in an unorthodox and illegal manner. We do not believe that these breakdown products resulted from any use of TCE in this facility as we have had no direct use. We further assert that these suspected trace amounts of breakdown products may have resulted from 1) the contaminated water supply from the Borough of Saegertown incoming into this facility and/or 2) the chlorination step in the Borough potable water supply system, incoming into this facility.

AR200799

United States Environmental Protection Agency  
August 31, 1988  
Page 2

Previously, we indicated that all manufacturing waste is hauled offsite by an approved transporter. This facility generates two types of nonhazardous wastes - 1) used oil, contaminated with water which is transported to a recycling facility for reuse and 2) oil sludge from the processing operations and, again, identified as nonhazardous by both listing and by characteristic testing as required by the EPA. The sludge, in the past, has been evaluated and found to be high in the total organic halogens (chlorine). This has been due to the free chlorine present in some cutting oils. The incoming material safety data sheets do not indicate any TCE in these materials and oils supplied to the site.

Past oil spillages, which have been documented in the distant past have not contained any TCE because of our nonuse of this material. In addition, extensive efforts have been undertaken to collect any oil-contaminated soil from this area far beyond the requirements of the EPA and the Pennsylvania DER.

In conclusion, we stand firm on our previous response of not being a contributor to the environmental pollution of the Saegertown Borough water supply system with TCE or trichloroethane.

Sincerely,

SAEGERTOWN MANUFACTURING CORPORATION

  
Chalmer C. Jordan  
President

cc: Robert G. Dwyer, Esquire  
Knox Graham McLaughlin Gornall and Sennett, Inc.

AR200800